

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:)	
)	
JOSEPH MARTIN THOMAS,)	Bankruptcy Case No. 20-10334 TPA
)	
Debtor.)	Chapter 11
_____)	
)	
)	Document No. _____
)	
)	Relates to Doc. No. 304, 347, 348, and
)	349
)	
)	Hearing Date & Time: TBD
)	
)	Responses Due: TBD

JOINT SUPPLEMENTAL STIPULATION AND AGREED ORDER

It is hereby stipulated and agreed by and between Steven E. Ribbing and Kay B. Ribbing (the “Ribblings”) and the Debtor, as follows:

WHEREAS, by Order of Court entered February 23, 2021, the Ribblings were granted relief from the automatic stay to pursue malpractice claims against the Debtor, subject to the limitation that any recovery be limited to available insurance proceeds;

WHEREAS, on February 16, 2021, the Debtor filed a Disclosure Statement, Plan Summary and Plan dated February 15, 2021;

WHEREAS, by Order of Court entered March 15, 2021, this Court entered an Order that set forth that “[n]otwithstanding anything set forth in either the Disclosure Statement, Plan or any related documents, nothing therein, including without limitation any provision that requests or grants the Debtor a discharge, shall affect the Ribbing’s rights to pursue their claims against the Debtor, subject to the limitation that any recovery be limited to available insurance proceeds”; and

WHEREAS, on April 1, 2021, the Debtor filed an amended Disclosure Statement, Plan Summary and Plan, each dated April 1, 2021.

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED:

1. Each of the above recital clauses is incorporated herein by reference as though fully set forth in this paragraph 1.

2. Notwithstanding anything set forth in either the amended Disclosure Statement, Plan or any related documents, as well as any further documents that may further amend any terms of any affected Disclosure Statement, Plan, or Plan Summary, nothing therein, including without limitation any provision that requests or grants the Debtor a discharge, shall affect the Ribbing's rights to pursue their claims against the Debtor, subject to the limitation that any recovery be limited to available insurance proceeds.

**THE REMAINDER OF THIS PAGE LEFT BLANK INTENTIONALLY. SIGNATURES
APPEAR ON NEXT PAGE.**

Dated: April 5, 2021

STEVEN E. RIBBING AND KAY B.
RIBBING

/s/ Ronald B. Roteman

Ronald B. Roteman, Esquire

PA ID No. 66809

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Dated: _____

IT IS SO ORDERED:

Thomas P. Agresti, Judge
United States Bankruptcy Court